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**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JIMMY ELLISON, an Individual)
)
 Plaintiff,)
)
 vs.)
)
 STATE OF NEVADA, *ex rel.* its OFFICE OF)
 THE MILITARY; DOES I through X; and ROE)
 CORPORATIONS I-X.)
)
)
 Defendants.)
)

Case No. 3:23-cv-00598-ART-CLB

**ORDER GRANTING STIPULATION,
 REQUEST AND ORDER TO
 EXTEND TIME TO FILE
 VOLUNTARY DISMISSAL
 (First Request)**

Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-3, Plaintiff JIMMY ELLISON (“Plaintiff” or “Mr. Ellison”), by and through his counsel of record, Dana Sniegocki, Esq. of HKM Employment Attorneys LLP, and Defendant STATE OF NEVADA, EX REL. ITS OFFICE OF THE MILITARY (“Defendant” or “OOM”), by and through its attorneys, AARON D. FORD, Attorney General for the State of Nevada, SCOTT H. HUSBANDS, Senior Deputy Attorney General, hereby submit this Stipulation, Request, and Order To Extend Time To File Voluntary Dismissal. This is the first request for an extension of time by the parties.

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1 The parties appeared for an early neutral evaluation on May 8, 2024 and were successful in
2 reaching a resolution of this matter. The Court directed Defendant's counsel to prepare and finalize the
3 parties' settlement agreement and the parties were to submit a stipulated voluntary dismissal with
4 prejudice. The Court directed the parties to file that stipulation no later than June 12, 2024. Defendant's
5 counsel had several unexpected client emergencies following the early neutral evaluation and was tied
6 up preparing for a contested evidentiary hearing in another matter. As a result, Defendant's counsel was
7 not able to prepare and share the draft settlement agreement until June 3, 2024. The parties have since
8 finalized that agreement and the parties have executed the agreement. It is expected that the contemplated
9 payments will be processed in approximately one week. Since Mr. Ellison will need those payments in
10 hand before signing off on a voluntary dismissal, the parties met and conferred and agreed on requesting
11 an additional 30 days to process and receive payment and file a voluntary dismissal with prejudice.

12 Pursuant to LR 26-3, the parties were unable to submit this stipulation by May 22, 2024. That is
13 the date that is 21 days prior to June 12, 2024 which is the deadline at issue in this stipulation. At that
14 time, the parties did not anticipate an issue with completing all settlement-related tasks by June 12, 2024.
15 It was only until last week that the parties recognized the need for an extension of time. The parties
16 waited until the last day, June 12, 2024, on the chance that the payments could be quickly processed, and
17 the parties could file a stipulation for dismissal. The additional 30 days that the parties are requesting
18 will allow sufficient time for the settlement payments to process, for Mr. Ellison to receive the settlement
19 payments, and for the parties to execute and file a stipulation for dismissal.

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1 Upon agreement by and between the parties, through their respective counsel, the parties request
2 that this Court grant the parties' request for an extension of time to file a stipulation for dismissal. Per
3 the terms of the parties' agreement, the parties will have up to and including July 12, 2024 to submit a
4 stipulation for dismissal.

5 APPROVED AS TO FORM AND CONTENT on the 12th day of June, 2024.

6 AARON D. FORD
7 ATTORNEY GENERAL

8 By: /s/ Scott H. Husbands
9 SCOTT H. HUSBANDS
Senior Deputy Attorney General

10 *Attorneys for Defendants*

11 HKM EMPLOYMENT ATTORNEYS LLP

12
13 BY: /s/ Dana Sniegocki
14 DANA SNIEGOCKI, ESQ.

15 *Attorney for Plaintiff*

16 **ORDER**

17 IT IS SO ORDERED.

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19 DATED: June 13, 2024

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21 UNITED STATES DISTRICT JUDGE